

THE HONORABLE JUDGE RONALD B. LEIGHTON

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

JOSEPH AND RENNY FANGSRUD VON
ESCH,

Plaintiffs,

v.

LEGACY SALMON CREEK HOSPITAL,
a Washington Company, ASSET
SYSTEMS, INC., an Oregon Corporation
d/b/a in Washington as ASSET SYSTEMS,
pursuant to Washington UBI No.
601474356,

Defendants.

NO. 3:16-cv-05482-RBL

**PLAINTIFFS' PROPOSED
VOIR DIRE**

PLAINTIFFS' PROPOSED VOIR DIRE

Plaintiffs JOSEPH AND RENNY FANGSRUD VON ESCH, through counsel, propose to ask the jury panel the following Voir Dire questions (in addition to standard questions asked by courts in the Western District of Washington¹):

Topic: Damages for emotional distress. Proposed questions:

1. Does anyone have concerns about or objections to a person getting money damages for things like frustration, stress, emotional distress, stress on the person's marriage, embarrassment or damage to a person's reputation?

¹ See, e.g., Judge Richard A. Jones' General Civil Voir Dire at <https://www.wawd.uscourts.gov/sites/wawd/files/JonesCourtsGeneralVoirDireCivil.pdf>

2. Anyone have a cap or top limit in their minds for the amount of money damages appropriate for that kind of harm or loss?

Topic: Experience with debt collection. Proposed questions:

3. Have you or any member of your family ever worked for a debt collection agency or in a collections department? Please explain.
4. Have you or anyone in your household ever been contacted by a debt collector? Please explain.
5. Has anyone here personally been told, incorrectly, that you had an unpaid bill or debt or owed more than you really did? What was your experience?
6. When it comes to financial security, some people feel they are more endangered now by creditors and debt collectors than they were before the "Great Recession" a decade ago. Others feel safer. Which are you a little closer to?
7. Some people feel that their financial problems are caused by the things beyond their control, like the economy. Other people feel that they are the only ones responsible for their financial situation. Which are you a little closer to?

Topic: Experience with medical billing. Proposed questions:

8. When it comes to medical billing, do you feel it is unnecessarily complicated and time-consuming these days?
9. How much time should families have to spend on "the paperwork?" Should people be resigned that billing problems are a part of modern life? Should businesses be more helpful or is it the consumer's responsibility to fix it? Which are you a little closer to?

Dated this 26th day of August, 2019 at Tacoma, Washington.

S//SaraEllen Hutchison

SaraEllen Hutchison, WSBA #36137

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PLAINTIFFS' PROPOSED VOIR DIRE
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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury under the laws of the State of Washington that on the 26th day of August, 2019, I electronically filed the foregoing through the Court's CM/ECF system which will electronically notify all registered CM/ECF participants in the case.

Dated this the 26th day of August, 2019, at Tacoma, Washington.

S//SaraEllen Hutchison

SaraEllen Hutchison, WSBA No. 36137

Attorney for Plaintiffs